



U.S. Department of Justice

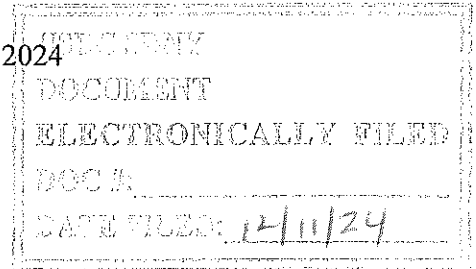
*United States Attorney
Southern District of New York*

MEMO ENDORSED

P.2

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

December 10, 2024



BY CM/ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Keonne Rodriguez and William Lonergan Hill*, 24 Cr. 82
(RMB)**

Dear Judge Berman:

The parties write to provide the Court with a status update in the above-referenced case and to request an approximately 90-day adjournment of the pretrial conference scheduled for December 17, 2024.

Since the last pretrial conference before the Court on September 17, 2024, the Government produced two additional batches of discovery on September 23, 2024 (Batch 3) and October 21, 2024 (Batch 4). On November 6, 2024, the Government also reproduced the first two batches of discovery (Batch 1 and Batch 2) to Defendant Keonne Rodriguez, due to encryption issues in the Government's original productions that prevented review. The Government is also currently in the process of producing Batch 5 of discovery to Defendant Rodriguez, which will likely be made available to his counsel within the next seven days and will cross-produce to Defendant Rodriguez the contents of the devices that were seized from Defendant William Hill's residence in Portugal.¹ Additionally, a taint team comprised of FBI agents has been diligently conducting privilege screens for any potentially privileged materials within the large volume of electronic devices seized from Rodriguez and Hill. The Government has completed its privilege review of approximately 16 electronic devices thus far, and it will be providing identified data to the defendants on a rolling basis moving forward as it completes review of the remaining approximately 29 devices. The Government's current estimate is that law enforcement will be able to provide identified data from its searches of these devices by late January or early February. A total of approximately 17 terabytes of data has been produced to the defense in discovery to date, which represents well over half of the discovery materials in this case. The outstanding discovery will largely consist of the identified data from the searches

¹ The Government already produced the Fifth Batch of discovery to Defendant Hill on November 25, 2024.

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of the devices, along with the data from any other electronic devices that the Government is able to successfully decrypt between now and trial.

Counsel for the defendants have indicated that they are continuing to review the voluminous discovery materials in this case and hope to be prepared to set a schedule for the filing of pretrial motions at a pretrial conference in March 2024. Additionally, the parties have conferred regarding scheduling and believe that a convenient date for trial in this matter would be in November 2025 or December 2025. If the Court has availability during that time, the parties would be amenable to scheduling a trial date.

For these reasons, the parties respectfully request that the Court adjourn the pretrial conference scheduled for December 17, 2024 for approximately 90 days. The Government also requests that the Court exclude time under the Speedy Trial Act between December 17, 2024 and the date of the next pretrial conference, which will allow for the defendants to continue to review the voluminous discovery materials in this case and prepare to file pretrial motions. The defendants consent to this exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Michael Krouse, Esq. (Counsel for Defendant Keonne Rodriguez)
Roger Burlingame, Esq. (Counsel for Defendant William Lonergan Hill)

Conference is adjourned to March 12, 2025 at 10:00 am. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter. Trial is scheduled for November 3, 2025. Pretrial submissions including joint jury charges, joint voir dire, joint verdict sheet and motions in limine are due October 1, 2025. Responses to motions in limine are due October 8, 2025. Final pretrial conference is scheduled for October 29, 2025 at 10:00 am.

SO ORDERED:

December 11, 2024

RMB


Richard M. Berman, U.S.D.J.